

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JOSEPH MARVIN FEAGLE, II,  
a minor under the age of 18, by his  
natural mother and guardian,  
KAREN D. FEAGLE

Plaintiff,

Case No.

v.

RADIUS GLOBAL SOLUTIONS, LLC,  
f/k/a CENTRAL CREDIT SERVICES, LLC,  
a Pennsylvania limited liability company,

Defendant.

/

**NOTICE OF REMOVAL**

Defendant, Radius Global Solutions, LLC f/k/a Central Credit Services, LLC (“Radius”) through counsel, files this notice of removal of this action from the Magistrate Court of Dekalb County, State of Georgia, to the U.S. District Court for the Northern District of Georgia, and respectfully states as follows:

1. Radius is a defendant in this civil action filed by plaintiff, Joseph Marvin Feagle, II, a minor under the age of 18, by his natural mother and guardian, Karen D. Feagle (“plaintiff”), in the Magistrate Court of Dekalb County, State of Georgia titled *Joseph Marvin Feagle, II, a minor under the age of 18, by his natural mother and guardian, Karen D. Feagle v. Radius Global Solutions, LLC f/k/a Central Credit Services, LLC*.

*natural mother and guardian, Karen D. Feagle v. Radius Global Solutions, LLC, f/k/a Central Credit Services, LLC, Case # 16M61453 (hereinafter the “State Court Action”).*

2. The defendant removes this case pursuant to 28 U.S.C. § 1441, as plaintiff’s Complaint purports to allege causes of action against the defendant that arise under federal law, including the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227, *et seq.*

3. Pursuant to 28 U.S.C. § 1446(b), defendant has timely filed this Notice of Removal. Radius was served with plaintiff’s Complaint on April 19, 2016. This Removal is filed within 30 days of service of the Complaint by Radius.

4. Attached hereto and incorporated by reference as part of the Notice of Removal are true and correct copies of the Civil Cover Sheet, Complaint and process and pleadings in the State Court Action. No further proceedings have taken place in the State Court Action.

6. A copy of this Notice of Removal is being served upon plaintiff and filed concurrently with the Magistrate Court of Dekalb County, State of Georgia.

WHEREFORE, Defendant, Radius Global Solutions, LLC f/k/a Central Credit Services, LLC, hereby removes to this Court the State Court Action.

Respectfully submitted,

/s/ Wendi E. Fassbender  
Wendi E. Fassbender, Esq.  
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Attorneys for  
Radius Global Solutions, LLC, f/k/a Central  
Credit Services, LLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 18<sup>th</sup> day of May 2016, a copy of the foregoing was filed via the court electronic system. A true and correct copy of the foregoing was sent via email to plaintiff's counsel as described below.

Cliff R. Dorsen, Esq.  
Skaar & Feagle, LLP  
2374 Main Street, Suite B  
Tucker, GA 30084  
cdorsen@skaarandfeagle.com

I additionally certify that the above-referenced document has been prepared in Times New Roman (14 point) font and this satisfies the font size requirements of this Court.

/s/ Wendi E. Fassbender  
Wendi E. Fassbender, Esq.

Attorneys for  
Radius Global Solutions, LLC, f/k/a  
Central Credit Services, LLC